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Ravalli County Commissioners

Both copy this to Planning + Env. Health & ask for their comments. GW

October 6, 2008

Carlotta Grandstaff, Chairwoman
Ravalli County Commissioners
215 South 4th Street, Suite A
Hamilton, MT 59840

RE: Letter of Notification
Proposed Schlecht Gravel Pit Permit Amendment
Corvallis, Montana

Dear Ms. Grandstaff:

On behalf of Blahnik Contruction, Inc., please find attached the description of the operations associated with the proposed Schlecht Gravel Pit permit amendment. The existing gravel pit is located on Blahnik land on the Eastside Highway approximately 1/3 mile north of the Popham Road intersection, approximately 2 ½ miles north of Corvallis. The proposed permit amendment would increase the existing gravel pit permit area from 13 acres to 40 acres. Facilities to be located within the proposed amended permit boundary would include a scale house/office, portable crusher/wash plant, concrete batch plant, asphalt batch plant, and various materials stockpiles.

A 30-day public participation period will run between October 8 and November 7, 2008. Notices will be run in the Ravalli Republic and Missoulian newspapers. During this time, the public will be provided information regarding the proposal on www.schlechtpitproposal.com or by contacting me or Blahnik Construction directly. PBS&J will be collecting public comments about the proposal on behalf of Blahnik Construction for analysis in an Environmental Assessment to be submitted to the Montana Department of Environmental Quality.

If you have any questions regarding the proposed Schlecht Gravel Pit permit amendment or the public participation period please do not hesitate to contact me at (406) 532-7254.

Sincerely,

Stephanie Lauer
Senior Environmental Scientist

enclosures

cc: Jerry Bowser, Helena Sand & Gravel/Blahnik Construction, P.O. Box 5960, Helena, MT 59604-5960

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October 6, 2008

Blahnik Construction, Inc.

Proposed Schlecht Gravel Pit Permit Amendment
Corvallis, Montana

Description of Proposed Action:

Proposed operations: The proposed amended permit area would encompass 40 acres and would include the current 13.2 acre permit area (Figure 2). Blahnik Construction proposes to mine to a depth of approximately 35 feet beginning in the spring of 2009, removing approximately 60,000 cubic yards of material per year over 10 to 15 years. Mining operations would commence adjacent to the existing pond. Facilities to be located within the proposed amended permit boundary include a scale house/office, portable crusher/wash plant, concrete batch plant, asphalt batch plant, and various materials stockpiles. Crushing/screening, grizzly screen, pug mill, wash plant and conveying equipment would be established on the site as necessary, to comply with aggregate production requirements (Figure 2).

Access: The proposed amended permit area would be located on Blahnik land on the Eastside Highway approximately 1/3 mile north of the Popham Road intersection, approximately 2 ½ miles north of Corvallis (Figure 1). The current access road into the site extends east from the Eastside Highway at the center of the property. This road would be replaced with a new access road extending east from the Eastside Highway on the northwest corner of the property (Figure 2). The new access road would be paved within two years of commencement of asphalt batching activities.

Method of mining: Mining would progress to a depth of 35 feet and would generally encounter groundwater at a depth of 2 feet below the ground surface (bgs) in the spring and 6.5 feet bgs in the fall/winter. Approximately 1.75 to 2 acres would be disturbed each succeeding year, depending upon demand. The topsoil and overburden material would be stripped from the mine and stockpile areas. The topsoil and overburden would be stockpiled separately. Any unprocessed pitrun material lying above the water table would be excavated with a front-end loader or excavator and transported to the crusher site via loader or conveyors. Mining of the material lying below the water table would be performed with a sky line dragline excavator. The excavator/dragline would operate generally from north to south, proceeding from west to east. The excavator/dragline would deposit the excavated material into a stockpile, located immediately adjacent to the pit area. The stockpiled material would be allowed to drain/dewater prior to loaders hauling the material to the crusher and wash plant for aggregate production. The water from the material would drain back into the pond formed by the excavation. No haul trucks are anticipated to be utilized on site at this time.

Truck traffic: Traffic in and out of the pit would be initially made at a single access point located at 1610 Eastside Highway. Approximately 5,500 annual deliveries of product would be made each year to locations in Ravalli County. Typical commercial traffic includes 10 cubic yard mixers, 12 CY dump trucks and 24 CY dump truck/trailer combinations. This traffic would generally occur on the Eastside Highway and Highway 93. A new access road would be constructed on the north property boundary once the mining encounters the current access road. The design section of the new access road would be capable of structurally supporting the traffic volume and loads of the trucks entering and leaving the site. The access road would be of adequate width to permit

two-way traffic. The wearing surface of the road would consist of asphalt pavement within two years of commencing asphalt hot mix production at the site.

Hours of operation: Normal hours of operation would be from 6:00 AM to 10:00 PM Monday through Friday. This includes mining and processing, repair and maintenance and asphalt/concrete batching. However, project demands may require commencement of the concrete batch plant and/or asphalt hot plant operations earlier in the morning or later in the evening, as may be necessary to comply with concrete placement standards or apply asphalt paving when traffic volume is lower for safety reasons.

Water supply: Water would be generated and/or used from the following sources: collected storm water runoff, recycled gravel wash water and well water. These water sources would provide water for the concrete batch plant, asphalt batch plant, crusher/wash plant and dust control.

The water for the gravel washing would be pumped into a pump pond over the period of approximately one week. Once the pump pond is full, water required for the gravel washing operation(s) would be pumped from the pump pond through the wash plant and be recycled through a series of two sediment settling ponds, prior to reentry into the pump pond for reuse. Depending upon the sediment retention time, a biodegradable flocculating agent may be incorporated into the process in order to shorten the time necessary for the sediment to settle out of the wash water. After settling, the gravel wash water would be reused in the crusher and wash plant production. The ponds would be located to the south of the plant site area (Figure 2).

The permit area drains internally and all storm water would be retained on-site. The concrete batch plant and asphalt batch plant areas would be graded so that any stormwater runoff would flow into the settling ponds.

All water used at the crusher, concrete batch plant and asphalt batch plant would be provided by three new groundwater wells to be located at or near the concrete batch plant, asphalt plant and the settling pond areas. Each of these wells would be exempt wells (<35 gallons per minute and/or 10 acre-feet/year).

Soil and groundwater protection: Fuel and asphalt liquids would be stored in aboveground dual-walled steel storage tanks. These tanks would be placed in secondary concrete containment enclosures. Temporary storage tanks used during the portable crushing/screening operations would be placed in secondary containment pits lined with sheet plastic. Blahnik Construction has prepared a draft Spill, Prevention, Control and Countermeasures Plan (SPCC) that addresses handling of fuel(s), asphalt cement(s), solvents, wash-water, and wastes associated with the asphalt plant, concrete plant and truck use. Some concrete and asphalt material may be temporarily stored on site pending recycling and reuse.

Reclamation: The site would be reclaimed to a landscape enhancement, recreation, and wildlife pond surrounded by grassed shores and upland areas. The trees and shrubs that were planted as part of noise and aesthetic enhancement would be left in place after operational activities have been completed. Blahnik Construction would alleviate compaction by ripping compacted surfaces and replaced overburden to a depth of at least 12 inches before resoiling. Topsoil would be disked prior to seeding. The office/facilities area and all internal roads would be reclaimed by removing surfacing

material, ripping, scarifying, topsoiling and seeding. Fertilizer would be applied at the time of seeding. Mulch would be used, if necessary.

Mitigation Measures: Topsoil berms would be placed around the entire proposed amended permit area to serve as aesthetic and sound barriers from the adjoining properties. These berms would be approximately 12 feet high and would be seeded. The entire site is currently fenced and cattle guards would be installed on the access road to prevent livestock from entering the proposed amended permit area.

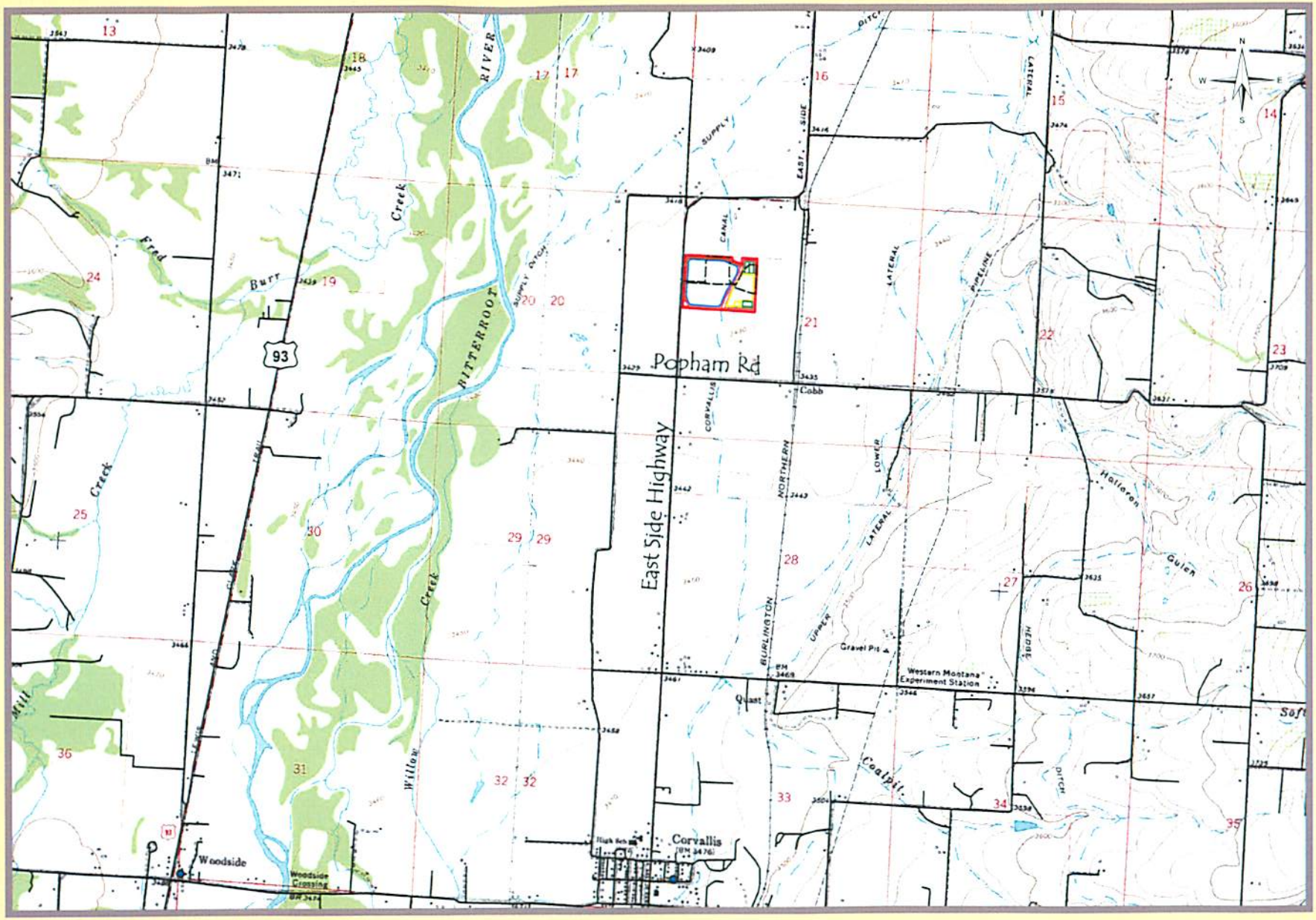
Trees and shrubs would be planted along the perimeter of the Blahnik property in the sections needed to reduce visible or audible impact to the distant neighboring residences. The necessary water to the trees and shrubs would be provided as needed via construction water truck(s) or an irrigation system. Temporary fencing would be used to protect the trees and seeded areas through at least two growing seasons.

The screening plant(s) associated with the crusher(s) are currently being equipped with polyurethane/rubber screen fabric, which demonstrate a drastic reduction of noise generated by the aggregate particles coming into contact with the screens as part of the production process. Manufacture's literature (Polydeck Screen Corportation) report that a noise reduction of 50% or 10 decibels can be expected when utilizing these screens. The change over from the standard screens is currently 30% complete and should be 100% complete by 2009. In addition, the jaw crusher is insulated with blue-board insulation, thereby dampening the noise generated by this piece of equipment. However, depending upon the availability of company-owner crusher/screening plant equipment, there would be occasions when a third-party contractor would be utilized for aggregate(s) production. These third-party contractor(s) may or may not be equipped with the Polydeck screen fabric. If the crusher(s) are operating at night, the loader(s) would be equipped with back-up strobes, in lieu of the standard back-up alarms.

The potential of asphalt odor generated by the asphalt hot plant would be limited by the incorporation of updated production equipment at the site and elimination of the current asphalt plant located at the site. The emissions from the updated asphalt hot plant would be regulated by a new air quality permit issued by the MDEQ and not the existing "grand-fathered" permit. The air quality permit would require the asphalt plant to be routinely tested for stack emissions/compliance. Blahnik's supervisory personnel actively participate in "Best Management Practice" meetings in order to stay current on new technologies for the asphalt production facilities.

In order to reduce the dust generated from delivery truck traffic, the access road would be paved within two years of commencing asphalt paving operations at the site. In addition, trees would be planted on the north side of the access road, thereby providing a wind break from the predominant northwest winds.

Noxious weeds on the property would continue to be managed in accordance with the existing Noxious Weed Control Plan approved by the Ravalli County Weed District.



Relative locations of features and boundary lines are approximate
A field survey is recommended for precise locations

Prepared By PBS&J 1120 Cedar Street Missoula, MT 59802

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Figure 1. Vicinity Map

Proposed Schlecht Pit Amended Permit Area

0 0.25 0.5 1 Miles

Scale: 1:36000 1 inch = 3000 feet

Relative locations of features and boundary lines are approximate.
A field survey is recommended for precise locations.

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Figure 2. Photo Site Map

Proposed Schlecht Pit Amended Permit Area

0 50 100 200 300 400 500 Feet

Scale: 1:3000 1 inch = 250 feet